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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
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11  
12 AILISHA VAUGHN,

13 Plaintiff,

14 vs.

15 ARAMARK CAMPUS, LLC, a  
Foreign Limited Liability Company;  
16 DOE INDIVIDUALS I-X; and ROE  
17 Business Organizations I-XX,

18 Defendants.

Case No. 2:25-cv-00447-APG-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)**

19 Pursuant to LR 26-4 and the scheduling order (Doc. 12) in this matter, Defendant  
20 ARAMARK CAMPUS, LLC ("Defendant") by and through their attorneys of record, LEWIS  
21 BRISBOIS BISGAARD & SMITH LLP, and Plaintiff AILISHA VAUGHN ("Plaintiff"), by and  
22 through her counsel of record, James P. Kemp, Esq., Collectively, "the Parties" hereby  
23 respectfully submit their Stipulation and Order to Extend Time for Discovery (First Request)  
24 pursuant Rules 6(b) and 26(f) of the Federal Rules of Civil Procedure and Local Rule 26-  
25 4.

26 This is the Parties' First Request for an Extension of Time, and the same is not  
27 brought for purposes of delay, but rather for the sole purpose of allowing the parties to  
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Case No. 2:25-cv-00447-APG-EJY

JOINT PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER

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1 diligently and adequately prepare their respective cases for either settlement discussions  
2 or trial.

3 **I. CASE BACKGROUND**

4 The subject lawsuit filed by Plaintiff Ailisha Vaughn alleges "claims of employment  
5 discrimination," specifically involving claims under federal statutes 42 U.S.C. § 1981  
6 ("Section 1981"), Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e,  
7 et seq. ("Title VII"), Americans with Disabilities Act, 42 U.S.C.A. §§ 12101, et seq. ("ADA"),  
8 and Family and Medical Leave Act, 29 U.S.C. §§ 2611, et seq. ("FMLA").

9 **II. DISCOVERY COMPLETED**

10 The parties have completed the following discovery:

- 11 1. Defendant's Request for Admissions Directed to Plaintiff, dated 05/23/25;
- 12 2. Defendant's Notice of Plaintiff's Ailisha Vaughn Deposition (date to be  
13 determined), dated 05/23/25;
- 14 3. Defendant's First Set of Requests for the Production of Documents to Plaintiff  
15 Ailisha Vaugh, dated 05/23/25;
- 16 4. Defendant's First Set of Interrogatories to Plaintiff Ailisha Vaugh, dated 05/23/25;
- 17 5. Defendant's Initial FRCP 26(a)(1) Disclosure, dated 05/27/25;
- 18 6. Plaintiff Ailisha Vaugh Answers to Defendant's First Set of Request for  
19 Admissions, Interrogatories, Requests for the Production of Documents dated  
20 07/11/252.

21 **III. DISCOVERY REMAINING TO BE COMPLETED**

22 The following discovery remains to be completed and is being pursued by the  
23 parties:

- 24 1. Deposition of Plaintiff;
- 25 2. NRCP 30(b)(6) deposition of Defendant;
- 26 3. Fact and witness depositions;
- 27 4. Initial Expert Disclosures;
- 28 5. Rebuttal Expert disclosures;

- 1 6. Expert depositions;
- 2 7. Parties to participate in Early Neutral Evaluation;
- 3 8. The Parties anticipate additional written discovery may take place, and
- 4 9. Any additional discovery the parties deem necessary.

#### 5 IV. REASONS FOR REQUESTED EXTENSION

6 The parties submit that good cause necessitates their requested extension for a  
7 multitude of reasons. Pursuant to LR 26-4 , a stipulation to extend any date set by the  
8 applicable discovery scheduling order must be supported by a showing of “good cause”  
9 and filed no later than 21 days before the discovery cut-off date. Here, good cause exists  
10 for extending discovery as the parties have timely submitted their request and have acted  
11 in good faith in attempting to comply with the discovery deadlines.

12 Further, the parties have not purposefully procrastinated or caused undue delay but  
13 continue to diligently pursue discovery in this matter. Various discovery remains to be  
14 completed and additional time is respectfully requested in order for the parties to be able  
15 to complete this discovery, as outlined above. The Parties filed a Joint Motion Requesting  
16 Assignment to the Early Neutral Evaluation Program (ECF No. [14]) which was granted on  
17 7/2/2025 and the Parties were very recently assigned a U.S. Magistrate Judge for purposes  
18 of conducting an Early Neutral Evaluation, however, the parties have not been provided  
19 with any dates as of yet.

20 Additionally, Plaintiff was served with written discovery and has requested multiple  
21 extensions due to medical issues causing her to be unable to respond which also prevents  
22 Defendant from serving subpoenas for medical records to defend against medical claims  
23 for discrimination.

24 Furthermore, should participation in the Early Neutral Evaluation Program not move  
25 the parties towards settlement, the Parties will need additional time to conduct additional  
26 written discovery, obtain and review Plaintiff’s medical and employment records, retain  
27 experts, locate and subpoena fact and other witnesses, and take depositions of Plaintiff,  
28 experts, treating physicians, and fact witnesses.

1 Therefore, the parties are requesting additional time to participate in the Early  
2 Neutral Evaluation Program and complete discovery, if the parties cannot bridge the gap  
3 to settlement following their participation.

4 The first discovery deadline is September 29, 2025. Accordingly, this request is  
5 being brought more than 21 days prior to that date pursuant to LR 26-4. Here, good cause  
6 exists because the parties have been as diligent as possible in conducting discovery,  
7 however, additional time is needed to obtain and review documents and then set  
8 depositions essential to this matter and other related discovery that is needed.

9  
10 Based on the foregoing, the parties respectfully request this Honorable Court grant  
11 their requested extension of the deadlines for Ninety (90) days, which, if granted, would be  
12 the parties' first extension of the discovery deadlines in this case. This request is not made  
13 in bad faith or to impose any unnecessary delays in the resolution of this matter.

14 **V. CURRENT AND PROPOSED SFOR COMPLETING REMAINING DISCOVERY**

Scheduled Event	Current Deadlines	Proposed Deadlines
Close of Discovery	September 29, 2025	December 29, 2025
File Motions to Amend Pleadings & Add Parties	July 1, 2025	September 29 2025
Initial Expert Disclosures	July 31, 2025	October 29, 2025
Rebuttal Expert Disclosures	September 1, 2025	November 30, 2025
Dispositive Motions	October 29, 2025	January 27, <sup>2026</sup> <del>2025</del>

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**VI. CONCLUSION**

Based on the foregoing, the Parties respectfully request that this Honorable Court approve this First Stipulation to Extend the Time for Discovery.

**APPROVED AS TO FORM AND CONTENT.**

**IT IS SO STIPULATED AND AGREED.**

**SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:**

Dated this 23rd\_ day of July, 2025.

Dated this \_23rd\_\_ day of July, 2025.

KEMP & KEMP

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ James P. Kemp

By: /s/ Brooke A. Bohlke

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*Attorneys for Defendant  
Aramark Campus, LLC*

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

Date: July 23, 2025